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December 10, 2020

**VIA ECF ONLY**

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2203  
New York, New York 10007

**Re: *Allstar Marketing Group, LLC, et al. v. Ryan Andersen d/b/a As Seen on TV & Beyond d/b/a As Seen on TV Pros d/b/a www.asseenontvpros.com***  
**Civil Action No. 1:20-cv-03703-RA**  
**JOINT STATUS LETTER & LETTER MOTION FOR ADJOURNMENT**

Dear Judge Abrams,

In accordance with the Case Management Plan and Scheduling Order (*Docket Entry No. 27*), and Your Honor's Individual Rules & Practices in Civil Cases (specifically Rule 1 (D)), the parties to the above-referenced action, Plaintiff Allstar Marketing Group, LLC, Plaintiff Ideavillage Products Corp., Plaintiff Telebrands Corp. d/b/a BulbHead, Defendant Ryan Andersen d/b/a As Seen On TV & Beyond d/b/a As Seen On TV Pros d/b/a [www.asseenontvpros.com](http://www.asseenontvpros.com) and Defendant As Seen on TV Pros d/b/a [www.asseenontvpros.com](http://www.asseenontvpros.com) (collectively, the "Parties") are hereby submitting the instant joint letter regarding the status of this case, and to request an adjournment *sine die* of the post discovery conference, scheduled for December 18, 2020 at 11:30 AM. The Parties have recently reached a settlement in principle, and are in the process of negotiating the terms of a formal written settlement agreement. The Parties anticipate that such a settlement agreement should be finalized in due course, and once certain conditions precedent have been met, a stipulation of dismissal will be filed with the Court within the next sixty (60) days. This is the Parties' first request for any adjournment,<sup>1</sup> and all Parties consent to the request made herein.

We thank the Court for its time and consideration.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

BY: S/ Kerry B. Brownlee  
Kerry B. Brownlee (KB 0823)

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<sup>1</sup> Defendants requested an extension of time to answer the Complaint, which was granted by the Court (*see Docket Entry Nos. 21-22*).

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Application granted. The post-discovery conference, currently scheduled for December 18, 2020, is hereby adjourned sine die. If the parties seek to have the Court retain jurisdiction to enforce a settlement agreement, the terms of the agreement must be placed on the public record and “so ordered” by the Court. See *Hendrickson v. United States*, 791 F.3d 354, 358 (2d Cir. 2015).

SO ORDERED.

  
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Ronnie Abrams, U.S.D.J.  
December 11, 2020